

EXHIBIT 2

Bruce Alan Rosenzweig, M.D.

Page 1

IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY, PENNSYLVANIA
TRIAL DIVISION - CIVIL

-----: :
IN RE: PELVIC MESH LITIGATION : February 2014, No. 829
-----: :
KATHRYN McGEE and MICHAEL :
McGEE, :
 : JULY TERM, 2013
Plaintiffs, :
 :
vs. : No. 003483
 :
ETHICON WOMEN'S HEALTH AND :
UROLOGY, A DIVISION OF :
ETHICON, INC., et al. :
 :
Defendants. :

The deposition of BRUCE ALAN ROSENZWEIG,
M.D., taken before Pauline M. Vargo, an Illinois
Certified Shorthand Reporter, C.S.R. No. 84-1573,
at the law offices of Wexler Wallace, LLP, Suite
3300, 55 West Monroe Street, Chicago, Illinois, on
February 4, 2016, at 8:55 a.m.

GOLKOW TECHNOLOGIES, INC.
877.370.3377 ph|917.591.5672 fax
deps@golkow.com

Bruce Alan Rosenzweig, M.D.

Page 2	Page 4
<p>1 APPEARANCES</p> <p>2 PRESENT ON BEHALF OF THE PLAINTIFFS:</p> <p>3 KLINE & SPECTER, P.C.</p> <p>4 1525 Locust Street</p> <p>5 Philadelphia, Pennsylvania 19102</p> <p>6 215.772.1000</p> <p>7 BY: JAMES J. WALDENBERGER, ESQ.</p> <p>8 james.waldenberger@klinespecter.com</p> <p>9</p> <p>10 CLARK LOVE HUTSON</p> <p>11 440 Louisiana Street, Suite 1600</p> <p>12 Houston, Texas 77002</p> <p>13 888.529.5222</p> <p>14 BY: WILLIAM W. LUNDQUIST, ESQ.</p> <p>15 wlundquist@triallawfirm</p> <p>16</p> <p>17 PRESENT ON BEHALF OF THE DEFENDANTS:</p> <p>18 BUTLER SNOW, LLP</p> <p>19 1020 Highland Colony Parkway, Suite 1400</p> <p>20 Ridgeland, Mississippi 39157</p> <p>21 601.985.4596</p> <p>22 BY: PAUL S. ROSENBLATT, ESQ.</p> <p>23 paul.rosenblatt@butlersnow.com</p> <p>24</p> <p>25 CAMPBELL CAMPBELL EDWARDS & CONROY</p> <p>26 One Constitution Plaza, 3rd Floor</p> <p>27 Boston, Massachusetts 02129</p> <p>28 617.241.3000</p> <p>29 BY: JAMES M. CAMPBELL, ESQ.</p> <p>30 jmcampbell@campbell-trial-lawyers.com</p> <p>31</p> <p>32 REPORTED BY:</p> <p>33 PAULINE M. VARGO, RPR, CRR</p> <p>34 Illinois CSR No. 84-1573.</p>	<p>1 EXHIBITS</p> <p>2 Continued</p> <p>3 ROSENZWEIG EXHIBIT MARKED FOR ID/INTRODUCED</p> <p>4 Exhibit 7 Neuman, et al., Study, 136</p> <p>5 "Transobturator vs.</p> <p>6 Single-Incision Mini-slings for</p> <p>7 Treatment of Female Stress</p> <p>8 Urinary Incontinence," et cetera</p> <p>9 5 Pages</p> <p>10 Exhibit 8 Hota, et al., Study, "TVT-Secur 147</p> <p>11 (Hammock) Versus TVT-Obturator,"</p> <p>12 et cetera, 5 Pages</p> <p>13</p> <p>14 Exhibit 9 Cornu, et al., Study, "Midterm 164</p> <p>15 Prospective Evaluation of</p> <p>16 TVT-Secur Reveals High Failure</p> <p>17 Rate," 5 Pages</p> <p>18 Exhibit 10 Maslow, et al., Study, 171</p> <p>19 "Randomized clinical trial</p> <p>20 comparing TVT Secur system and</p> <p>21 transvaginal obturator tape,"</p> <p>22 et cetera, 6 Pages</p> <p>23 Exhibit 11 Withdrawn/Omitted 176</p> <p>24 Exhibit 12 Mostafa, et al., Study, 176</p> <p>25 "Single-Incision Mini-Slings</p> <p>26 versus Standard Midurethral</p> <p>27 Slings in Surgical Management of</p> <p>28 Female Stress Urinary</p> <p>29 Incontinence," et cetera,</p> <p>30 26 Pages</p> <p>31 Exhibit 13 Nambiar Cochrane Review, 179</p> <p>32 "Single-incision sling</p> <p>33 operations for urinary</p> <p>34 incontinence in women"</p> <p>35 117 Pages</p>
Page 3	Page 5
<p>1 INDEX</p> <p>2 Thursday, February 4, 2016</p> <p>3 WITNESS EXAMINATION</p> <p>4 BRUCE ALAN ROSENZWEIG, M.D.</p> <p>5 By Mr. Rosenblatt.....Page 6</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 EXHIBITS</p> <p>12 ROSENZWEIG EXHIBIT MARKED FOR ID/INTRODUCED</p> <p>13 Exhibit 1 Binder with Tabs 1 through 50 62</p> <p>14 Retained by Deponent</p> <p>15 Exhibit 2 Binder with Tabs 51 through 91 62</p> <p>16 Retained by Deponent</p> <p>17 Exhibit 3 Notice of Deposition of Bruce 72</p> <p>18 Rosenzweig, M.D.</p> <p>19 9 Pages</p> <p>20 Exhibit 4 Expert Report of Bruce 79</p> <p>21 Rosenzweig, M.D.</p> <p>22 26 Pages</p> <p>23 Exhibit 5 Bruce Rosenzweig, M.D. 79</p> <p>24 Supplemental Reliance List</p> <p>25 2 Pages</p> <p>26 Exhibit 6 Bruce Rosenzweig, M.D.'s Fourth 100</p> <p>27 Supplemental Expert Report,</p> <p>28 Huskey v. Ethicon</p> <p>29 6 Pages</p> <p>30</p>	<p>1 EXHIBITS</p> <p>2 Continued</p> <p>3 ROSENZWEIG EXHIBIT MARKED FOR ID/INTRODUCED</p> <p>4 Exhibit 14 Gynecare TVT Secur Instructions 185</p> <p>5 for Use</p> <p>6 ETH.MESH.02340568 through</p> <p>7 ETH.MESH.02340590</p> <p>8</p> <p>9 Exhibit 15 Walters/Weber Article, "Which 188</p> <p>10 Sling for which SUI Patient?"</p> <p>11 13 Pages</p> <p>12 Exhibit 16 Schimpf, et al., Study, "Sling 191</p> <p>13 surgery for stress urinary</p> <p>14 incontinence in women:</p> <p>15 A systematic review and</p> <p>16 metaanalysis"</p> <p>17 27 Pages</p> <p>18 Exhibit 17 Tincello, et al., Study, "The 203</p> <p>19 TVT Worldwide Observational</p> <p>20 Registry for Long-Term Data,"</p> <p>21 et cetera, 6 Pages</p> <p>22 Exhibit 18 Walsh Study, "TVT-Secur 209</p> <p>23 mini-sling for stress urinary</p> <p>24 incontinence: A review of</p> <p>25 outcomes at 23 months" 6 Pages</p> <p>26 Exhibit 19 "TVT Secur: European Feedback" 212</p> <p>27 ETH.MESH.00572598, 10 Pages</p> <p>28</p> <p>29 Exhibit 20 TVT Secur Quality Board 213</p> <p>30 Presentation, 20 Pages</p> <p>31 Exhibit 21 Professional Education Slide 218</p> <p>32 Deck for TVT Secur, 37 Pages</p> <p>33</p> <p>34 Exhibit 22 Professional Education Slide 221</p> <p>35 Deck for TVT Secur, 28 Pages</p> <p>36 Exhibit 23 "TVT Secur PQI07-041 Quality 227</p> <p>37 Board Follow Up" 26 Pages</p> <p>38</p>

2 (Pages 2 to 5)

Bruce Alan Rosenzweig, M.D.

Page 130	Page 132
<p>1 Q. In TVT Secur?</p> <p>2 A. In midurethral slings.</p> <p>3 Q. We are just talking about TVT Secur.</p> <p>4 A. I would add TVT Secur in that, Masati.</p> <p>5 Q. So when you are describing the frequency</p> <p>6 that should be in the IFU, you think the highest</p> <p>7 purported frequency in the medical literature</p> <p>8 should be the number that's attached to the</p> <p>9 complication?</p> <p>10 A. I think that would be very important for</p> <p>11 doctors to be able to tell their patients what the</p> <p>12 worst-case scenario would be.</p> <p>13 Q. And so these figures that you are</p> <p>14 providing for me, would it be fair to say that they</p> <p>15 are worst-case scenario?</p> <p>16 A. There are some. There are some that</p> <p>17 would be averages.</p> <p>18 Q. Okay. So we will move to dyspareunia.</p> <p>19 What is the frequency percentage that you would</p> <p>20 attach to dyspareunia for TVT Secur?</p> <p>21 A. We have already discussed that.</p> <p>22 Q. You said 8 to 10 percent?</p> <p>23 A. Correct.</p> <p>24 Q. What about for untreatable and permanent</p>	<p>1 described in the literature, but that should be</p> <p>2 information that the manufacturer has.</p> <p>3 Q. What about narrowing?</p> <p>4 A. Same answer.</p> <p>5 Q. Shortening?</p> <p>6 A. Same answer.</p> <p>7 Q. Fibrosis?</p> <p>8 A. Same answer.</p> <p>9 Q. Scar plate formation?</p> <p>10 A. All mesh causes scar plate formation.</p> <p>11 Q. Deformation?</p> <p>12 A. Deformation, that is information that</p> <p>13 the manufacturer should have.</p> <p>14 Q. The safety and effectiveness of the TVT</p> <p>15 Secur has not been evaluated in either long-term</p> <p>16 clinical studies or randomized controlled trials?</p> <p>17 A. Long-term, yes.</p> <p>18 Q. And you describe long-term as --</p> <p>19 A. Five to ten years.</p> <p>20 Q. Are you aware of any five-year studies</p> <p>21 evaluating the TVT Secur?</p> <p>22 A. I think there was one Tommaselli study</p> <p>23 that was a five-year study.</p> <p>24 Q. Are you aware of any others?</p>
Page 131	Page 133
<p>1 pain?</p> <p>2 A. If you look at the literature for</p> <p>3 patients that have been treated for pain, the</p> <p>4 untreatability for pain is anywhere from 20 to 40</p> <p>5 percent, so patients --</p> <p>6 Q. For the TVT Secur?</p> <p>7 A. For midurethral slings.</p> <p>8 Q. Okay. I'm just talking about TVT Secur.</p> <p>9 A. And I would add TVT Secur into that.</p> <p>10 Q. So 20 to 40 percent?</p> <p>11 A. Of patients that have chronic pain, the</p> <p>12 inability and the permanency of the treatment.</p> <p>13 Q. What is the frequency that you would</p> <p>14 attach to partner penile injury with intercourse</p> <p>15 related to the TVT Secur?</p> <p>16 A. I don't know if there is a number that</p> <p>17 has been placed in the literature. That should be</p> <p>18 a number that the manufacturer should have from</p> <p>19 complaints that they have been given.</p> <p>20 Q. Have you reviewed those documents?</p> <p>21 A. No, I have not.</p> <p>22 Q. And what is the percentage of vaginal</p> <p>23 scarring that you would attach to the TVT Secur?</p> <p>24 A. Again, I have not seen that number</p>	<p>1 A. I think there was one or two others.</p> <p>2 Q. So does that statement still stand?</p> <p>3 A. Those were not randomized control</p> <p>4 trials, if I remember correctly.</p> <p>5 Q. So, your testimony is that you are not</p> <p>6 aware of any randomized controlled trials that have</p> <p>7 followup that goes out to five years?</p> <p>8 A. Not that I specifically recall.</p> <p>9 Q. But if you were aware of such a study,</p> <p>10 that would be an important study to add to your</p> <p>11 reliance list, correct?</p> <p>12 A. Yes.</p> <p>13 Q. The necessity of multiple surgeries to</p> <p>14 remove mesh; what is the frequency of mesh removal</p> <p>15 for TVT Secur?</p> <p>16 A. That would be based on the complications</p> <p>17 of pain, erosion, dyspareunia. So, if you look at</p> <p>18 the treatment algorithm, approximately 50 percent</p> <p>19 of erosions are going to require surgical</p> <p>20 management. I would say that would be in the same</p> <p>21 ballpark for the other complications of pain and</p> <p>22 dyspareunia.</p> <p>23 Q. I'm going to jump back to something. I</p> <p>24 think I've cleaned it up enough for you.</p>

34 (Pages 130 to 133)

Bruce Alan Rosenzweig, M.D.

<p style="text-align: right;">Page 246</p> <p>1 MR. ROSENBLATT: Nothing further at 2 this time. 3 MR. WALDENBERGER: No questions. 4 MR. LUNDQUIST: None for the MDL 5 either. 6 THE REPORTER: Signature? 7 MR. WALDENBERGER: Read and sign, 8 usual stips, read and sign. 9 MR. ROSENBLATT: And my understanding 10 is that the de bene esse deposition will take 11 place next Wednesday. 12 MR. WALDENBERGER: Correct. 13 MR. ROSENBLATT: Off the record. 14 (At 3:02 p.m. the deposition was 15 concluded.) 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 248</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition 4 over carefully and make any necessary 5 corrections. You should state the reason 6 in the appropriate space on the errata 7 sheet for any corrections that are made. 8 After doing so, please sign 9 the errata sheet and date it. It will be 10 attached to your deposition. 11 It is imperative that you 12 return the original errata sheet to the 13 deposing attorney within thirty (30) days 14 of receipt of the deposition transcript 15 by you. If you fail to do so, the 16 deposition transcript may be deemed to be 17 accurate and may be used in court. 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 247</p> <p>1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER 2 I, PAULINE M. VARGO, a Certified 3 Shorthand Reporter of the State of Illinois, 4 C.S.R. No. 84-1573, do hereby certify: 5 That previous to the commencement of the 6 examination of the witness, the witness was duly 7 sworn to testify the whole truth concerning the 8 matters herein; 9 That the foregoing deposition transcript 10 was reported stenographically by me and thereafter 11 reduced to typewriting under my personal direction; 12 That the reading and signing of said 13 deposition was reserved by counsel for the 14 respective parties and the witness; 15 That the foregoing constitutes a true 16 record of the testimony given by said witness 17 before this reporter; 18 That I am not a relative, employee, 19 attorney or counsel, nor a relative or employee of 20 such attorney or counsel for any of the parties 21 hereto, nor interested directly or indirectly in 22 the outcome of this action. 23 24 CERTIFIED TO THIS 5th DAY OF FEBRUARY, A.D., 2016. Pauline M. Vargo, RPR, CRR Illinois Certified Shorthand Reporter No. 84-1573</p>	<p style="text-align: right;">Page 249</p> <p>1 ----- 2 E R R A T A 3 ----- 4 PAGE LINE CHANGE 5 _____ 6 REASON: _____ 7 _____ 8 REASON: _____ 9 _____ 10 REASON: _____ 11 _____ 12 REASON: _____ 13 _____ 14 REASON: _____ 15 _____ 16 REASON: _____ 17 _____ 18 REASON: _____ 19 _____ 20 REASON: _____ 21 _____ 22 REASON: _____ 23 _____ 24</p>

63 (Pages 246 to 249)